

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

RUSSELL STEWART,)	
)	
Plaintiff,)	Civ. No. 04-1200-SLR
)	
v.)	
)	
STATE OF DELAWARE, _____))	
DEPARTMENT OF PUBLIC SAFETY, _____))	
CAPITOL POLICE, _____))	
_____))	
Defendant _____))	

PLAINTIFF'S RESPONSE TO REQUEST FOR DOCUMENTS

1. All documents and tangible things referred to in Plaintiff's complaint.

ANSWER: Attached is the Right to Sue Letter and the Letter of Qualification from the Capitol Police

2. All documents and tangible things identified or that should be identified in response to Defendant's Interrogatories.

ANSWER: Attached is the Right to Sue Letter and the Letter of Qualification from the Capitol Police

3. All reports by expert(s) retained by Plaintiff in connection with this matter as well as his or her current qualifications, and any documents supplied or reviewed by that individual. This includes all communications between Plaintiff, her lawyer or agents and such experts.

ANSWER: Objection. Any communication between Plaintiff and Attorney or his agents is privileged without waiver and by way of additional response, Plaintiff has not retained any experts at this time but reserves the right to do so.

4. All statements, in writing or oral, by any party or witness, in any form, relating to the incidents or circumstances that form the basis of this lawsuit.

ANSWER: Objection. Oral statements cannot be supplied as they are oral.

5. All videotapes, audiotapes, or photographs taken by you that refers or relates to any claim or defense in the present matter.

ANSWER: None

6. All records or reports regarding examination, treatment or counseling of plaintiff.

ANSWER: None

7. All documents or physical evidence that supports or weakens any claim by Plaintiff in this matter.

ANSWER: Objection. Overly broad, vague

8. All applications for unemployment or benefits from any source and any decisions to grant the same as well as any transcripts of such proceedings.

ANSWER: None

9. All federal and state tax returns for the last four years.

ANSWER: Attached hereto.

/s/ R. Stokes Nolte

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Date: 3/30/05